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February 19, 2020

VIA ECF/CM

Hon. Lorna G. Schofield
United States District Judge
U.S. District Court Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 1106
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: **02/19/2020**

Re: *United States v. Michael Hollingsworth*
19 Cr. 333 (S.D.N.Y.) (LGS)

Dear Judge Schofield:

I represent Michael Hollingsworth, who entered a plea to accepting a gratuity in December and whose final Presentence Investigation Report (PSR) is to be disclosed to the Court shortly. Mr. Hollingsworth is currently scheduled to be sentenced on March 24, 2020. I write to ask that the Court adjourn the sentencing until a date in or after late April and adjust the deadline for the final PSR until at least Friday, February 28, 2020. This is the first request for an adjournment and the government does not object.

My firm represents several thousand of the victims of the September 11, 2001 attacks and their family members. *See Ashton et al. v. al Qaeda et al.*, 03-md-1570 (02-cv-6977). In connection with a federal fund created for victims of state-sponsored terrorism and the liability judgment we obtained against Iran, for the past six weeks I have been working on obtaining final damages judgments and preparing all information necessary for the applications that must be filed with the United States Victims of State Sponsored Terrorism Fund. In light of the extraordinary time demands this project has placed on me and other members of my office (including judicial filing deadlines of January 3, 2020, January 15, 2020 and January 31, 2020 and an administrative filing deadline for the over 1200 cases for which we obtained damages judgments of February 19, 2020), I have not been able to adequately address some of the considerations that will be crucial for Mr. Hollingsworth's sentencing. This includes, among other things, following up on requests for records from collateral sources such as educational institutions and medical providers. Based on recent communications, I believe that we will need to seek judicial subpoenas for those records, and I am in the process of preparing those materials. Even so, however, we expect it will take several weeks to obtain responsive documents, determine their relevance for purposes of sentencing and incorporate relevant information into our sentencing submission.

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Accordingly, I respectfully request that this Court adjourn the currently scheduled sentencing date of March 24, 2020 for approximately one month, to a date convenient to the Court in late April or thereafter, and also adjust the date by which the final PSR must be disclosed to February 28, 2020 or later.

Respectfully submitted,

/s/ Megan W. Bennett

MWB:lr

cc: All counsel of record via ECF/CM

Application Granted. Defendant Hollingsworth's sentencing hearing is adjourned to April 21, 2020 at 4:30 p.m. Defendant's pre-sentencing submission shall be filed by March 30, 2020. The Government's pre-sentencing submission, if any, shall be filed by April 2, 2020. The final PSR shall be completed on or before March 3, 2020. The Clerk of the Court is directed to terminate the letter motion at docket number 44.

Dated: February 19, 2020
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE